

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**  
Case No. 1:23-md-03076-KMM

**IN RE:**

**FTX Cryptocurrency Exchange Collapse Litigation**

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This Document Relates To:

*O'Keefe v. Sequoia Capital Operations, LLC, et al.*  
Case No. 23-cv-20700 (S.D. Fla.)

*O'Keefe v. Temasek Holdings (Private) Limited, et al.*  
No. 1:23-cv-23065 (S.D. Fla.)

*Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.*  
Case No. 1:23-cv-22960 (S.D. Fla.)

*Cabo, et al. v. Temasek Holdings (Private) Limited, et al.*  
No. 1:23-cv-23212 (S.D. Fla.)

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**REPLY DECLARATION OF MATTHEW GRAHAM IN FURTHER SUPPORT OF  
DEFENDANT SINO GLOBAL CAPITAL HOLDINGS, LLC'S  
MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, MATTHEW GRAHAM, being over the age of 21, hereby declare as follows:

1. I am the managing member of Defendant Sino Global Capital Holdings, LLC ("SG Capital Holdings"). I have personal knowledge of all of the following facts and, if called as a witness, could and would competently testify thereto.
2. I make this reply declaration in further support of SG Capital Holdings' Motion to Dismiss the Administrative Complaint for Lack of Personal Jurisdiction. ECF No. 300. In particular, in this reply declaration I refute certain inaccurate statements made by Plaintiffs on Page 9 of their Opposition. ECF No. 358.
3. SG Capital Holdings is not incorporated in, or registered to do business in Florida.

4. SG Capital Holdings does not operate, conduct, engage in, or carry on a business or any business venture in Florida.

5. SG Capital Holdings does not maintain any place of business, office, facility, or agency in Florida. While SG Capital Holdings has utilized a co-working space as a mailing address, SG Capital Holdings does not regularly use such space, and it does not serve as SG Capital Holdings' office.

6. SG Capital Holdings does not have any physical operations in Florida.

7. SG Capital Holdings does not regularly do business in Florida.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 4, 2023.

By: Matthew Graham

Matthew Graham